



COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

ONE SOUTH STATION
BOSTON, MA 02110
(617) 305-3500

JANE SWIFT
GOVERNOR

JENNIFER DAVIS CAREY
DIRECTOR OF CONSUMER AFFAIRS
AND BUSINESS REGULATION

JAMES CONNELLY
CHAIRMAN
W. ROBERT KEATING
COMMISSIONER
EUGENE J. SULLIVAN, JR.
COMMISSIONER
PAUL B. VASINGTON
COMMISSIONER
DEIRDRE K. MANNING
COMMISSIONER

William S. Stowe, Assistant General Counsel
Boston Edison Company d/b/a NSTAR Electric
800 Boylston Street
Boston, Massachusetts 02199

BY FAX AND U.S. MAIL

RE: Boston Edison Company, D.T.E. 01-108

February 4, 2002

Dear Mr. Stowe:

Enclosed please find the Department's third set of information requests on the above-captioned matter to Boston Edison Company. Responses should be filed on or before February 11, 2002. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

cc: Mary Cottrell
Staff as assigned
Service List

Encl.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

BOSTON EDISON
COMPANY

)
)
)
)
)

D.T.E. 01-108

THIRD SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BOSTON EDISON COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company and the Massachusetts Water Resources Authority in this proceeding.

1. "BECo" or "Company" means Boston Edison Company, its officers, directors, employees, consultants, and attorneys.
2. "Company Filing" or "Filing" means all the documents BECo filed in this proceeding.
3. "MWRA" means the Massachusetts Water Resources Authority.
4. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
5. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
6. These requests shall be deemed continuing so as to require further supplemental responses if the Company or MWRA or their witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
7. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and

Third Set of Department Information Requests

basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

8. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
9. If the Company or MWRA finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
10. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Owen Cahillane, Rates and Revenues Requirements Division; (3) Claude Francisco, Rates and Revenues Requirements Division; (4) Sean Hanley, Rates and Revenues Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

_____)	
BOSTON EDISON)	
COMPANY)	D.T.E. 01-108
)	
_____)	

THIRD SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BOSTON EDISON COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests. The following questions pertain to the rebuttal testimony ("Rebuttal Testimony") of Henry LaMontagne filed by Boston Edison Company ("BECo") with the Department on February 1, 2002.

- DTE-3-01 In reference to the Rebuttal Testimony of Henry LaMontagne at 2, when were the combustion turbines built? Please provide a copy of the contract between MWRA and BECo for the construction of combustion turbines.
- DTE-3-02 In reference to the Rebuttal Testimony of Henry LaMontagne at 3, please provide a copy of the "cable agreement," and all amendments thereto, between Harbor Electric Energy Company and MWRA.
- DTE-3-03 In reference to the Rebuttal Testimony of Henry LaMontagne at 3, please provide schedules to support BECo's 12.76 percent overall return for 2001 on the cable investment.